

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

JOHNNY R. HAYES,

Plaintiff,

v.

HYUNDAI MOTOR AMERICA, INC.,

Defendant.

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C/A No.: 2:20-cv-04481-DCN

**PLAINTIFF'S
MOTION TO REMAND**

Plaintiff hereby moves the Court for an Order remanding this case to the Colleton County Court of Common Pleas (Circuit Case No. 2020CP1500675). This motion is based on grounds that the Court lacks subject matter jurisdiction because the amount in controversy does not exceed \$75,000.00 as required by 28 U.S.C. § 1332, as so represented in the Plaintiff's Irrevocable Stipulation of Damages, attached as Exhibit A. Plaintiff's counsel has consulted with defense counsel and is advised that Defendant consents to Plaintiff's Motion to Remand.

Respectfully Submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P. A.

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ATTORNEYS FOR PLAINTIFF

January ____, 2021
Hampton, South Carolina